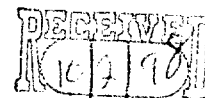




PHARMAVITE

1569 '98 OCT -6 P3:00

September 25, 1998



Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St. SW
Washington, DC 20204

Dear Sir or Madam:

Pursuant to Section 403(r)(6) of the Federal Food, Drug and Cosmetic Act and Section 101.93 of FDA's regulations, we hereby notify you that we are using the following statement(s):

- (1) Name and address of manufacturer:
Pharmavite Corporation, PO Box 9606, Mission Hills, CA 91346
- (2) Text of the statement(s):
Echinacea may help boost immune function

Zinc plays an essential role in growth and development and helps the body's natural defense system. Echinacea may help stimulate natural resistance by helping maintain the immune system.

Echinacea has been the subject of numerous scientific studies involving its ability to help maintain natural resistance.
- (3) Name of the dietary ingredient if not provided in the text of the statement:
see above
- (4) Name of the dietary supplement:
Zinc with Echinacea Lozenges

The above statement(s) may be used in one or more of the following brands of products: Nature Made, Sunny Maid, Nature's Resource, AAFES, AARP, Osco, Sav-On, Valu Wise, Bartell Drug, CVS, Duane Reade, Walgreens, Longs, Spring Valley, Brite Life, Family Pharmacy, GNP, Valu-Rite.

zinc with echinacea lozenges.wpd

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We certify the information in this notice is complete and accurate, and we have substantiation that the above statement(s) is truthful and not misleading.

Sincerely,

David Kropp
Manager, Regulatory and Legal Affairs